

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

<p>EON CORP. IP HOLDINGS, LLC,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>T-MOBILE USA, INC., RESEARCH IN MOTION CORPORATION, NOKIA INC., BEST BUY CO., INC., WAL-MART STORES, INC., COSTCO WHOLESALE CORPORATION, OVERSTOCK.COM, INC., SEARS ROEBUCK AND CO., AMAZON.COM, INC., RADIOSHACK CORPORATION, ALCATEL-LUCENT USA INC., D-LINK SYSTEMS, INC., INTELLINET TECHNOLOGIES, INC., ACME PACKET INC., JUNIPER NETWORKS, INC., SAMSUNG TELECOMMUNICATIONS AMERICA LLC, and CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS,</p> <p style="text-align: right;">Defendants.</p>	§ § § § § § § § § § § § § § § § § § §	<p>Civil Action No. 6:10-cv-00379-LED</p> <p>JURY TRIAL REQUESTED</p>
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**PLAINTIFF EON CORP.IP HOLDINGS, LLC'S ANSWER TO
ALCATEL-LUCENT USA INC.'S COUNTERCLAIMS
TO PLAINTIFF'S FOURTH AMENDED COMPLAINT**

Plaintiff and counterclaim defendant EON Corp. IP Holdings, LLC (“Plaintiff” or “EON”), through undersigned counsel files this amended answer to defendant Alcatel-Lucent USA Inc.’s (“Defendant” or “Alcatel”) counterclaims (Doc. No. 413) as follows:

1. EON admits the allegation of Paragraph 107 that this Court has jurisdiction over the asserted counterclaims.
2. EON admits to Paragraph 108.
3. EON admits that it has submitted to personal jurisdiction in this Court in claims arising in this suit. EON denies the remaining allegations of to Paragraph 109.

**ALCATEL'S FIRST COUNT
(Non-Infringement)**

4. EON admits to Paragraph 110.
5. EON denies the allegations of Paragraph 111.
6. EON denies Alcatel is entitled to the relief it seeks in Paragraph 112.

**ALCATEL'S SECOND COUNT
(Invalidity)**

7. EON admits to Paragraph 113.
8. EON denies the allegations of Paragraph 114.
9. EON denies Alcatel is entitled to the relief it seeks in Paragraph 115.

PRAYER FOR RELIEF

Paragraphs A through D set forth the statement of relief requested by Alcatel, to which no response is required. To the extent any response is required, EON denies that Alcatel is entitled to any of the requested relief and denies any allegations contained therein as they relate to EON. To the extent Paragraphs A through D contain factual allegations, EON denies them to the extent they relate to EON.

Dated: September 1, 2011.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2011, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Eastern District of Texas, using the electronic case files system of the court. The electronic case files system sent a “Notice of Electronic Filing” to individuals who have consented in writing to accept this Notice as service of this document by electronic means, all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by first class mail today, September 1, 2011.

/s/ Craig S. Jepson
Craig S. Jepson